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**From:** Carlheinz.Bayer@bmwna.com [Carlheinz.Bayer@bmwna.com]  
**Sent:** 11/2/2017 8:38:44 PM  
**To:** Ball, Joel [ball.joel@epa.gov]  
**CC:** Maria.V.Nizhegorodova@bmwnaext.com; Carlheinz.Bayer@bmwna.com  
**Subject:** RE: Question about safety recall involving an emission related component

Thanks for the instant response and clarification, Joel!  
Best regards  
Carlheinz

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**From:** Ball, Joel [mailto:ball.joel@epa.gov]  
**Sent:** Thursday, November 02, 2017 3:28 PM  
**To:** Bayer Carlheinz, EG-8-US-2 <Carlheinz.Bayer@bmwna.com>  
**Cc:** Nizhegorodova Maria, (Maria.V.Nizhegorodova@bmwnaext.com) <Maria.V.Nizhegorodova@bmwnaext.com>  
**Subject:** RE: Question about safety recall involving an emission related component

Hi Carlheinz,

EPA expects a VERR and quarterly completion/progress reporting for such a recall because it does affects an emission relevant component.

I hope this helps, let me know if you have any further questions,

Best regards

Joel Ball  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4238  
[ball.joel@epa.gov](mailto:ball.joel@epa.gov)

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**From:** [Carlheinz.Bayer@bmwna.com](mailto:Carlheinz.Bayer@bmwna.com) [mailto:Carlheinz.Bayer@bmwna.com]  
**Sent:** Thursday, November 02, 2017 3:05 PM  
**To:** Ball, Joel <[ball.joel@epa.gov](mailto:ball.joel@epa.gov)>  
**Cc:** [Carlheinz.Bayer@bmwna.com](mailto:Carlheinz.Bayer@bmwna.com); [Maria.V.Nizhegorodova@bmwnaext.com](mailto:Maria.V.Nizhegorodova@bmwnaext.com)  
**Subject:** Question about safety recall involving an emission related component

Hello Joel,  
long time no talk...

I have a question for you:

We initiated a safety recall which affects a emission relevant component, the PCV valve.

Reading the regulations, I didn't find that particular case. It's talked about the safety impact on a emission related component but not vice versa.

My conclusion would be no EDIR, VERR or any completion/progress reporting. Is that correct?

Thanks

Carlheinz

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